

Action Plan and Chronology of Activities for the Community of Crossett

Ashley County, Arkansas

October 22, 2014

Background: Crossett, Arkansas, has a population of about 5,500 residents and is located in southeastern Arkansas just nine miles north of the state's border with Louisiana. Residents from one of Crossett's predominantly African-American neighborhoods have been concerned for many years about air emissions and water discharges from the Georgia-Pacific LLC paper facility (GP). The facility complex includes a paper mill, plywood mill (currently inactive), and two chemical plants.

Deputy Regional Administrator Sam Coleman and staff from the Office of Environmental Justice and Tribal Affairs (OEJTA) traveled to Crossett on February 22, 2014. The purpose of the visit was to participate in a tour of the community and a community meeting at the request of Mr. David Bouie, Sr. Mr. Bouie represents the local group Concerned Citizens for Environmental Justice (CCEJ), which was formed to better address the community's concerns with GP.

Concerns raised by the community during the meeting include the following:

1. Exposure to hydrogen sulfide and overall air quality
2. Drinking water contamination and the GP wastewater treatment system
3. Hazardous waste disposal on GP property and within the community
4. Long-term exposure to hazardous chemicals, and
5. Communication at the local and state levels.

The purpose of this Action Plan is to provide information and identify actions that will be pursued by U.S. Environmental Protection Agency Region 6 (EPA), the Arkansas Department of Environmental Quality (ADEQ), and the Arkansas Department of Health (ADH) to address the community's concerns. We believe working in partnership with our state partners, local officials, and the community is vital to creating sustainable environmental outcomes and building strong EPA-state-local relationships. This is a dynamic plan that will be updated as needed. Progress on this plan will be discussed with community representatives on a regular basis.

1. Community Air Concerns: Hydrogen Sulfide. Residents are concerned about exposure to hydrogen sulfide. The primary source of hydrogen sulfide releases at the GP facility is the wastewater treatment process. Hydrogen sulfide produced in the digester is collected and sent to an incinerator. EPA Region 6 conducted inspections at the GP facilities on March 19-21, 2014, under Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA 313). EPCRA 313 established the Toxics Release Inventory (TRI), which is a publicly available database that contains information on toxic chemical releases and waste management activities reported annually by certain industries and federal facilities. GP's hydrogen sulfide reporting for the TRI was calculated using modeling studies, not monitoring results. The purpose of the inspections was to determine if GP's facilities have correctly reported to the TRI. EPA has requested additional information from GP concerning their TRI reports.

EPA Region 6 provided Mr. Bouie with web links to the following background information on the TRI and reporting requirements for hydrogen sulfide on March 24, 2014.

- (News Release) EPA Reinstates Toxics Release Inventory Reporting Requirements for Hydrogen Sulfide,
- (Federal Register Notice) Lifting of Administrative Stay for Hydrogen Sulfide,
- The Statute (Law) – Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA), and
- The Regulations – 40 CFR § 372 – Toxic Chemical Release Reporting: Community Right-To-Know.

➤ **EPA Commitments:** Extensive review of the data collected during the inspection is needed for EPA to determine if a facility is in compliance with TRI requirements. EPA will review the inspection data and make the inspection report available if the facility is found to be in compliance. If violations are found, EPA will take enforcement action and make that information available once the enforcement action is complete.

The inspection report for the GP pulp mill establishment has been finalized and is currently being reviewed for the facility's compliance with EPCRA 313. Inspection reports for the other two establishments – chemicals operations and the plywood/stud mill operations – are under preparation. The pulp mill establishment inspection report contains observations made at the time of the inspection regarding EPCRA 313 and includes amounts of TRI chemical releases to air, land, and water, along with amounts of the TRI chemicals waste managed at this establishment for calendar years 2008 through 2012.

This information is also available to the public through EPA's website *Envirofacts*:
<http://www.epa.gov/enviro/>.

An electronic version of the EPCRA 313 pulp mill establishment inspection report can be accessed via the EPA Region 6 website at: <http://www.epa.gov/region6/6en/public.html>.

Overall Air Quality. In response to community concerns about overall air quality, EPA reviewed air quality planning, permitting, and monitoring information for the Crossett area.

Air Quality Planning – The Clean Air Act requires EPA to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. EPA has set NAAQS for six principal pollutants: carbon monoxide, lead, nitrogen dioxide, ozone, particle pollution, and sulfur dioxide. Crossett, AR, is in compliance with all NAAQS.

ADEQ's Clean Air Act 111(d) Plan requirements for kraft pulp mills were approved in 1998. The plan requires the GP facility to conduct compliance testing and continuous monitoring requirements for Total Reduced Sulfur (TRS) emissions. TRS is the sum of the sulfur compounds hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide.

In 1999, EPA issued regulations to improve visibility, particularly in national parks and recreation areas. Those regulations required states to develop plans, known as State Implementation Plans, to address emissions that contribute to regional haze. Among the required elements of these plans, states must include determinations of Best Available Retrofit

Technology (BART) for certain types of sources that emit pollutants that impair visibility, and long term strategies to ensure that reasonable progress is being made. The Arkansas Regional Haze State Implementation Plan (RH SIP) was submitted to EPA in September 2008. EPA Region 6 worked with ADEQ and GP to ensure the 6A and 9A boilers at the facility were in compliance with BART requirements.

➤ **EPA, ADEQ Commitments:** EPA and ADEQ will continue to make information on federal and state permitted facilities within Ashley County that may impact air quality available to the community. A database of all permits issued by ADEQ can be found at the following link: <http://www.adeq.state.ar.us/home/pdssql/pds.aspx#display>. This database can be searched by county and city.

ADEQ conducted a public meeting in Crossett on August 26, 2014. This meeting was conducted in partnership with ADH and EPA to provide information and answer questions on operations at the GP plant. Staff from GP also participated in the meeting.

During the meeting, ADEQ provided information on GP's wastewater treatment permits and air emissions and state requirements for the management of solid and hazardous waste on the site. ADEQ also provided information on water quality and other permitted facilities in Ashley County. ADH staff discussed planned air sampling, cancer statistics, general health information, and community resources available at the Local Health Unit (LHU).

GP's representatives provided information on the facility's air emissions, including plans for hydrogen sulfide monitoring, an overview of its wastewater treatment system, and an overview of state and federal permit regulations.

Staff from EPA Region 6 participated in the meeting to discuss how it is supporting efforts in Crossett and coordinating with state agencies and GP to conduct temporary ambient air monitoring for hydrogen sulfide.

Air Permitting – Currently, the GP paper facility has an ADEQ Title V operating permit (Permit No. : 0597-AOP-R14) that is effective from August 4, 2011 – August 3, 2016. In addition, this facility operates under Air Permit #0736-AOP-R9 for the plywood/stud mill and Air Permit #1177-AOP-R12 for the chemical facilities. GP is not currently required to have a greenhouse gas permit for the facility. More detail on the facility's Title V permit for the paper facility is provided below.

Permit Limits and Requirements:

Overall Applicable Requirements:

- MACT I – Controlling hazardous air pollutant (HAP) emissions from production areas using kraft, sulfite, semi-chemical, and soda pulping processes
- MACT II (Subpart MM) – Controlling HAP emissions from pulping recovery combustion areas
- MACT III – Controlling HAP emissions from production areas using mechanical, secondary fiber, and non-wood pulping, and papermaking systems

- Kraft Pulp Mill New Source Performance Standards (NSPS) – Controlling Particle Matter and Total Reduced Sulfur (TRS)
- Boiler MACT: Subpart 5D establishes requirements to demonstrate initial and continuous compliance with national emission limits and work practice standards for HAPs emitted from industrial, commercial, and institutional boilers.

Actual Requirements in the Current Operating Permit for GP:

- National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart S or Cluster Rule (Pulp and Paper Industry or MACT I & III) since 1999 on their second Title V permit: TRS
- NESHAP Subpart MM for Chemical Recovery Combustion Sources at Kraft, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills (MACT II): PM (surrogate for HAP metals), VOC, CO, SO₂, NO_x for smelt tanks, evaporator recovery furnaces that are used for combustion spent pulping liquor; THC (surrogate for gaseous organic HAPs)
- Compliance Assurance Monitoring has been required for the two largest boilers and their two incinerators/scrubbers since 2003.

Permit Emission Limits by Pollutant and Tons Per Year (TPY)

Pollutant	TPY
Particulate Matter	1,403.5
Particulate Matter ₁₀	1,372.6
Sulfur Dioxide (SO ₂)	1,037.4
Volatile Organic Compounds	3,209.3
Carbon Monoxide	11,484.5
Nitrogen Oxides (NO _x)	5,522.4
Lead	0.53
Total Reduced Sulfur (TRS)*	130.7

* TRS is the sum of the sulfur compounds hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide

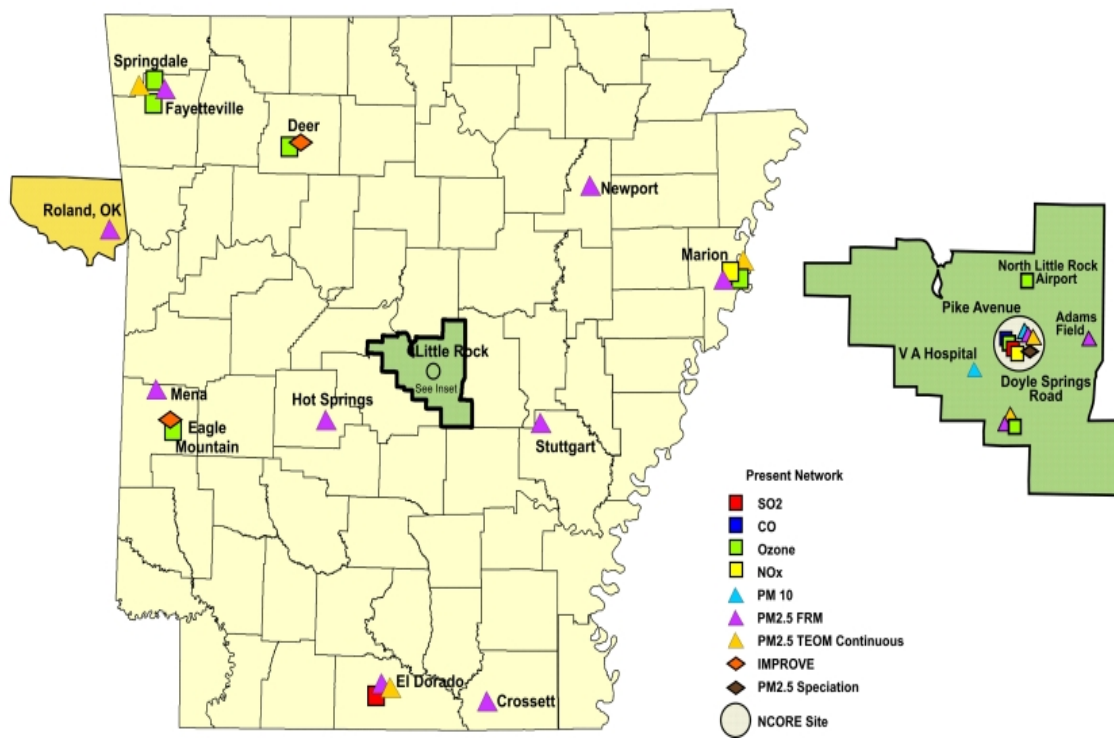
➤ **ADEQ Commitments:** ADEQ will inform the community on how to access information on permit renewal cycles for identified facilities in the Crossett area and provide information on the permitting process and public participation opportunities by September 2014.

Information on permitted facilities in Ashley County was provided by ADEQ during the public meeting on August 26, 2014.

Air Monitoring – On Dec. 14, 2012, EPA strengthened the nation’s air quality standards for fine particle pollution to 12 micrograms per cubic meter (ug/m3) to improve public health protection. ADEQ operates a Particulate Matter 2.5 ambient air monitor in Crossett, and the 2010-2013 preliminary annual design value is 10 ug/m3, which is under the national standard of 12 ug/m3.

The nearest sulfur dioxide monitor to Crossett is in El Dorado, Arkansas, which is approximately 45 miles away. An ADEQ ambient air monitoring network map is shown below.

Image 1: ADEQ ambient air monitoring network.



➤ **EPA, ADEQ Commitments:** EPA and ADEQ will work together to examine whether more air quality monitoring should be conducted within the community and provide the community with an update by September 2014.

GP agreed to conduct voluntary temporary ambient air monitoring for hydrogen sulfide outside the GP facility property boundary in Crossett. The sampling effort is expected to start in October 2014 and last six months. GP will also establish a meteorological tower during the sampling period in order to correlate wind direction to the measured concentrations. This information was provided during the public meeting on August 26, 2014.

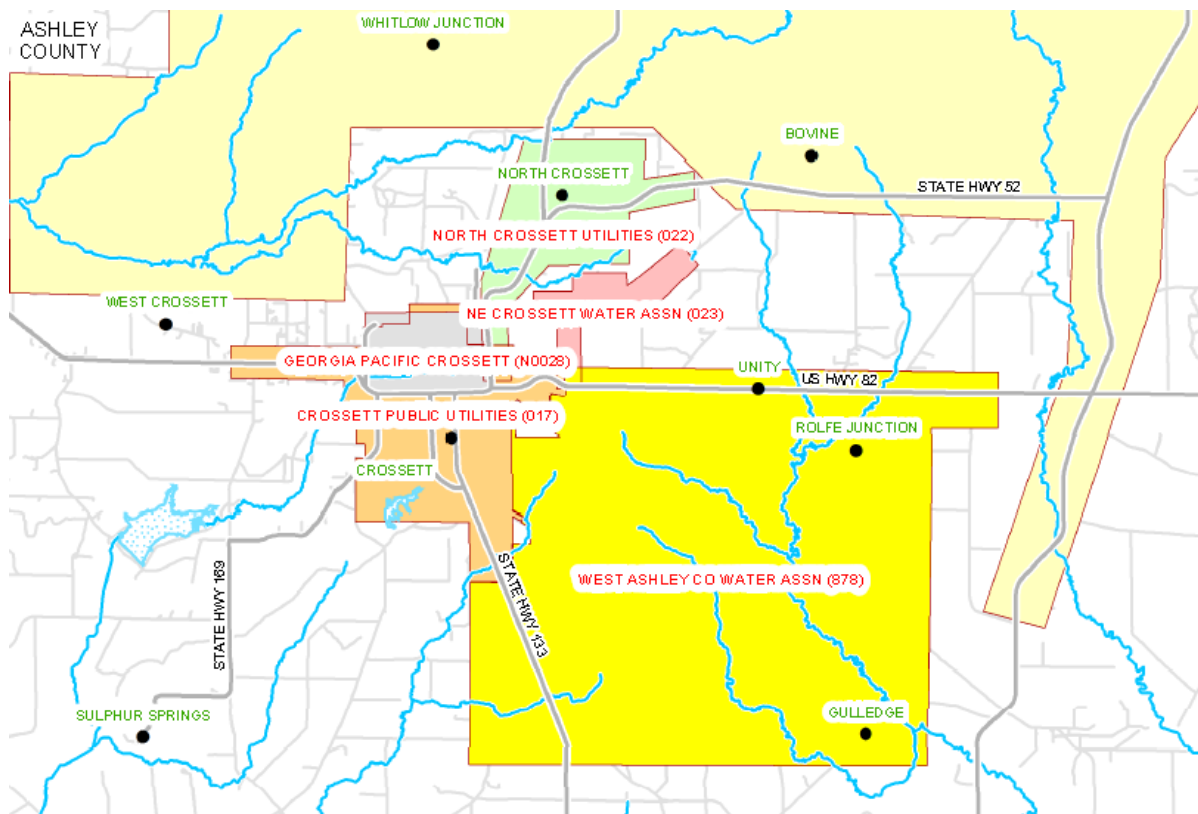
A team has been established with representatives from ADEQ, ADH, ATSDR, GP, and EPA Region 6 to execute this effort. At the end of the sampling period, a data analysis report will be generated that will include a comparison with the ATSDR health-based values. The summary information related to the data will be hosted on ADEQ’s website.

2. Community Water Concerns: *Drinking Water* – In regards to community concerns about drinking water contamination, EPA Region 6 conducted a thorough review of the most recent sanitary surveys and the Consumer Confidence Reports for the past 10 years of the four drinking water systems that serve the Crossett area. We also examined a fifth sanitary survey for the GP paper mill, which is not a community water system.

The five water systems that were reviewed are listed below:

1. Crossett Water Commission – AR017
2. North Crossett Utilities – AR022
3. Northeast Crossett Water Association – AR023
4. West Ashley County Water Association – AR878
5. Georgia Pacific Water – Paper Mill – AR N028

Image 2: Drinking water systems near Crossett, Arkansas.



EPA determined that the public drinking water systems are in compliance with all state and federal drinking water rules that are implemented by ADH. Based on this review, EPA has determined that there is currently no imminent risk to public health from the drinking water provided by these public drinking water systems to residents near Crossett, Arkansas.

EPA Region 6 sent a letter dated April 3, 2014, to Mr. Bouie in response to community drinking water concerns. Included with the letter was the Region 6 “Review of Public Drinking Water

Systems Near Crossett, Arkansas,” which summarized the information and results of our assessment.

Residents with additional questions concerning their community drinking water utilities may contact the following individuals:

- Mr. Anthony Adcock, Plant Superintendent of the Crossett Water Commission and West Ashley County Water Association, at 870-364-4195.
- Mr. Jeff Russell, Manager of the North Crossett Utilities and Northeast Crossett Water Association, at 870-364-2188.
- Ms. Rachel Johnson, Supervisor of Georgia Pacific Water – Paper Mill, at 870-567-8144.

➤ **ADH Commitments:** ADH will work with local water officials to inform the community on how to access Consumer Confidence Reports and help educate the community on drinking water information and testing by August 2014. ADH will also continue to respond to any resident concerns about drinking water.

This information was provided during the public meeting on August 26, 2014. Staff from the Crossett Water Commission participated in the meeting and provided copies of its 2013 Annual Drinking Water Quality Report.

➤ **EPA Commitments:** EPA and ADEQ will continue to make information on federal and state permitted facilities within Ashley County that may impact water quality available to the community.

Information on water quality and permitted facilities in Ashley County was provided by ADEQ during the public meeting on August 26, 2014.

➤ **ADEQ Commitments:** ADEQ will continue to provide information on listed impaired waters in Ashley County to the community.

This information was provided during the public meeting on August 26, 2014.

Wastewater Treatment – GP’s current National Pollutant Discharge Elimination System (NPDES) permit became effective on November 1, 2010; was modified on July 1, 2011; and expires on October 31, 2015. The permit requires the facility to sample and test its effluent and to monitor its compliance with permit conditions. It also requires GP to file with EPA and ADEQ certified Discharge Monitoring Reports (DMRs) of the results of monitoring, and Noncompliance Reports when appropriate. A review of the DMRs for the last 5 years showed that the facility has been in compliance with its NPDES permit limits. EPA will continue to monitor the facility.

➤ **ADEQ Commitments:** ADEQ will provide information on the permit, permit renewal process, and public participation opportunities for the GP wastewater treatment system by September 2014.

Information on GP’s wastewater treatment permits was provided by ADEQ during the public meeting on August 26, 2014.

3. Disposal of Hazardous Materials: *Hazardous Waste Disposal* – Community members have expressed concerns that hazardous materials are being disposed of on GP property and within the community. The GP facility is a large quantity generator (LQG), which means it generates 1,000 kilograms per month or more of hazardous waste, or more than 1 kilogram per month of acutely hazardous waste. Requirements for LQGs include:

- LQGs may only accumulate waste on site for up to 90 days. Certain exceptions apply.
- LQGs do not have a limit on the amount of hazardous waste accumulated on site.
- There must always be at least one employee available to respond to an emergency. This employee is the emergency coordinator responsible for coordinating all emergency response measures. LQGs must have detailed, written contingency plans for handling emergencies.
- LQGs must submit a biennial hazardous waste report to EPA and an annual hazardous waste report to ADEQ.

In 2013, GP used Philip Reclamation Services and Safety Kleen as its transporters for hazardous waste to off-site facilities. Hazardous waste was sent to the following two facilities in 2013:

- Chemical Reclamation Services (CRS), 405 Powell Street, Avalon, TX, TXD046844700: CRS received 43 lbs of D002 waste (a caustic floor cleaner); 427 lbs of D001 and F003 (ignitable wastes and used solvents); 600 lbs of D001 (ignitable wastes); 20 lbs of D002, D007, D009 and D011 (corrosive waste, chromium, mercury, and silver); and 1,600 lbs of D001 (ignitable oil-based paint).
- Safety Kleen Systems, 3536 Fite Road, Millington, TN, TND000614321: Safety Kleen received 4,409 lbs of D039 (Tetrachloroethylene or PCE).

The total amount of waste manifested and transported off-site in 2013 was 7,099 lbs.

Mr. James Cutbirth, Superintendent of Environmental Services (870-567-8144), and Mr. Richard Freeman, Environmental Engineer, are the hazardous waste managers at GP and may be contacted by residents with additional questions.

Boiler Ash Disposal – According to GP, numerous analytics are conducted on the boiler ash that it generates prior to its use on site as a landfill cover. The boiler ash contains TRI metals (zinc, lead, barium, manganese) and trace amounts of dioxins. Further documentation of the analytics was gathered during the EPA inspection conducted March 19-21, 2014. The data shows all constituents are below toxicity characteristic leaching procedure (TCLP) values and can be treated as solid waste and placed in a permitted onsite landfill. The TCLP data was analyzed at American Interplex labs, which is an accredited lab, in Little Rock, AR.

➤ **ADEQ Commitments:** ADEQ investigated the complaint of improper disposal of waste by GP on private property that was expressed by a Crossett resident during the February 2014 community tour and meeting. There was no evidence found to indicate chemical waste had been buried on the property. ADEQ will reopen the investigation if necessary as additional information is received. In addition, information on state requirements for the management of solid and hazardous waste on the site was provided during the public meeting on August 26, 2014.

4. Long-term exposure to hazardous chemicals: Residents believe there is a higher rate of cancer in the community due to long-term exposure to chemicals from the GP facility. Several also indicated suffering from some kind of respiratory condition. During a March 20, 2014, conference call with Mr. Bouie, there were questions about community exposure to hydrogen sulfide on a daily basis and the potential health impacts. Toxicology staff from Region 6 looked into this item and herein provides information regarding the potential harm from hydrogen sulfide exposure and the occurrence of hydrogen sulfide.

In a 2012 report prepared for Ouachita Riverkeeper Inc., the Louisiana Environmental Action Network (LEAN) reported air concentrations from 1 to 25 parts per billion (ppb) downwind from the GP facility using a Jerome Hydrogen Sulfide Monitor. The rotten egg smell of hydrogen sulfide would be perceptible at this range of air concentrations. The EPA chronic Reference Concentration (RfC) and the Agency for Toxic Substance and Disease Registry (ATSDR) acute-duration Minimum Risk Level (MRL) were used as comparison values. The range of hydrogen sulfide concentrations in the 1 to 25 ppb are below the acute-duration MRL (70 ppb) which indicates that harmful effects would not be anticipated from exposure up to 14 days; however, the range of hydrogen sulfide concentrations were above the chronic RfC (1.3 ppb) which indicates that long-term exposure (i.e., 70 years) could result in harmful effects. Without additional exposure information, the long-term health impacts from hydrogen sulfide cannot be evaluated.

Hydrogen sulfide gas occurs both naturally (e.g., swamps and stagnant water) and from human-made processes (e.g., pulp and paper mills). Hydrogen sulfide is a colorless gas with the characteristic odor of rotten eggs. People can smell hydrogen sulfide at low air levels (odor threshold of 0.5 ppb); however, at higher air levels, a person might lose the ability to smell it. Hydrogen sulfide has not been shown to cause cancer in humans. The harm caused by hydrogen sulfide is evaluated due to its noncarcinogenic health effects. Brief exposures to high air levels (greater than 500,000 ppb) of hydrogen sulfide can cause a loss of consciousness. Lower air levels (2,000 ppb to 20,000 ppb) of hydrogen sulfide may cause irritation to the eyes, nose or throat, and headaches. Hydrogen sulfide may cause people with asthma to have difficulty breathing.

The EPA has inhalation (breathing) guidelines called Acute Exposure Guideline Levels (AEGLs) for hydrogen sulfide ranging from 750 ppb to 330 ppb with exposure-durations ranging from 10 minutes to 8 hours. Individuals exposed to hydrogen sulfide levels above the AEGL-1 described above could experience notable discomfort and irritation. The ATSDR has an acute-duration (1 to 14 days) MRL of 70 ppb. The chronic noncarcinogenic health effects of hydrogen sulfide are evaluated by comparison to an inhalation RfC of 1.3 ppb. The RfC of 1.3 ppb hydrogen sulfide is equivalent to the reported concentration of 2 micrograms/cubic meter ($\mu\text{g}/\text{m}^3$). The RfC is an air level that allows for continuous daily exposure for a lifetime (i.e., 70 years) without harm to sensitive individuals including children.

➤ **EPA, ADEQ Commitments:** EPA and ADEQ will work together to examine whether more air quality monitoring should be conducted within the community and provide the community with an update by September 2014.

GP agreed to conduct voluntary temporary ambient air monitoring for hydrogen sulfide outside the GP facility property boundary in Crossett. The sampling effort is expected to start in October 2014 and last six months. GP will also establish a meteorological tower during the sampling period in order to correlate wind direction to the measured concentrations. This information was provided during the public meeting on August 26, 2014.

A team has been established with representatives from ADEQ, ADH, ATSDR, GP, and EPA Region 6 to execute this effort. At the end of the sampling period, a data analysis report will be generated that will include a comparison with the ATSDR health-based values. The summary information related to the data will be hosted on ADEQ's website.

At a community meeting held in Crossett on April 12, 2014, ADH informed the residents of an elevated stroke rate for Ashley County. The community was informed that cancer rates for Ashley County are comparable to state rates. This information was also included in the materials presented by ADH at the public meeting in Crossett on August 26, 2014.

➤ **ADH Commitments:** ADH will complete a draft health consultation document by August 2014, and the draft will be submitted to ATSDR for review and finalization. The health consultation usually contains a review of the available environmental data, health outcome data, community issues of concern, community outreach activities, etc.

The draft health consultation is currently in review by ATSDR.

5. Local and State Communication: Community members stated that local officials, ADEQ, and GP had not been responsive to their concerns. For example, residents asserted that local water officials did not provide information when services were interrupted. Also, local officials and GP did not provide information when there was an incident or release related to the facility, according to the community.

EPA Region 6 reached out to ADEQ and ADH to better coordinate and leverage resources in assisting the community with their concerns. We worked with ADEQ and ADH to research air, water, and compliance information related to Crossett and the GP facility. DRA Sam Coleman also committed to participate in a second community meeting on April 12, 2014, and to invite representatives from the City of Crossett's public water systems, ADEQ, ADH, and GP to attend the meeting to enhance communication at the local and state levels.

GP declined to attend the meeting; however, they did provide information on their public outreach activities in Crossett and a point-of-contact for any questions community members might have. Ms. Teresa Walsh is the Public Affairs and Communications Manager for GP in Crossett (870-567-8083) and can provide more information on the facility's community outreach and engagement program and its Community Advisory Council meetings.

EPA, ADEQ, and ADH are committed to the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

- Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.
- Meaningful involvement means that:
 - People have an opportunity to participate in decisions about activities that may affect their environment and/or health
 - The public's contribution can influence the regulatory agency's decisions
 - Their concerns will be considered in the decision making process, and
 - The decision makers seek out and facilitate the involvement of those potentially affected.

➤ **EPA, ADEQ, ADH Commitments:** EPA, ADEQ, and ADH will continue to coordinate to provide information, assistance, training, and resources to address the community's concerns.

➤ **ADEQ, ADH Commitments:** ADEQ and ADH will inform the community about information that is relevant to their concerns that is already publicly available and how to access such information by August 2014.

This information was provided during the public meeting on August 26, 2014.

➤ **EPA Commitments:** EPA will work with the appropriate state and local officials to provide information on local emergency planning by September 2014.

EPA Region 6 conducted a Local Emergency Planning Committee (LEPC) workshop, in El Dorado, Arkansas, on August 12, 2014. A representative from the Ashley County LEPC was invited to and attended the workshop. The purpose of the workshop was to assist communities and facilities with emergency preparedness and accident prevention.

➤ **ADEQ Commitments:** ADEQ will take the lead in conducting future public meetings with Crossett residents to ensure information is available and accessible and to provide opportunities for meaningful public participation. ADEQ will also keep EPA apprised of the status of issues/progress. The next meeting with the community will be held August 26, 2014.

ADEQ was the lead agency in planning and conducting the public meeting in Crossett on August 26, 2014. The meeting included Concerned Citizens for Environmental Justice, the Crossett Water Commission, ADH, EPA, and GP.

➤ **ADH Commitments:** ADH will conduct outreach and events to promote awareness of community health issues, such as cancer, stroke, etc. Outreach will include notices via newspaper, radio, flyers, email, and participation in future community meetings as needed. For information about local programs and events, residents can contact the ADH Ashley County, Local Health Unit Administrator, Ms. Tammy Cook, at 870-364-2115.

Staff from the ADH LHU in Ashley County conducted a stroke awareness health fair on May 15, 2014. In addition, ADH participated in the public meeting on August 26, 2014, and discussed planned air sampling, cancer statistics, general health information, and community resources available at the LHU.

CHRONOLGY OF CROSSETT COMMUNITY ACTIVITIES

November 2011 – GP representatives traveled to EPA Region 6 in response to an environmental justice complaint made about the facility. Part of the complaint stemmed from the release of a video that focused on the community and their concerns with the GP facility.

January and April 2012 – Inspections conducted by EPA Region 6 found the GP facility to be in compliance with NPDES and hazardous waste permits.

June 19-21, 2013 – EPA Region 6 conducted an Environmental Justice Training Workshop for EJ community leaders in Albuquerque, New Mexico. Pastor David Bouie, Sr. of Crossett, AR, participated in the workshop and spoke about his community's concerns with air emissions and water discharges from the GP facility. At the event, RA Ron Curry indicated Region 6 would visit the community.

December 2013 – EPA Region 6 received a first draft of the GP Use Attainability Analysis (UAA) for Coffee Creek and Mossy Lake for review and comment from ADEQ. This issue is related to the community's concerns with the GP wastewater treatment system and its impact on wildlife. Residents stated they have always eaten fish caught in Coffee Creek and still continue to do so.

February 22, 2014 – DRA Sam Coleman and staff from OEJTA traveled to Crossett, AR, to participate in a tour of the community and a community meeting hosted by Pastor Bouie and the local group Concerned Citizens for Environmental Justice.

March 11, 2014 – Conference call with Pastor Bouie, DRA Sam Coleman, and staff from 6WQ and OEJTA to further discuss community concerns with drinking and ground water.

March 19-21, 2014 – EPA Region 6 conducted inspections at the GP facility under Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA). Extensive review of the data collected during the inspection is required for EPA to determine if a facility is in compliance with TRI requirements. We are currently in the process of reviewing the inspection data.

March 20, 2014 – Follow-up conference call with Pastor Bouie, Cheryl Slavant (Ouachita Riverkeeper Inc.), DRA Sam Coleman and staff from 6PD, 6WQ, and OEJTA to further discuss community concerns with hydrogen sulfide, drinking water, and the GP wastewater treatment system.

April 3, 2014 – EPA Region 6 sent a letter to Pastor Bouie responding to his drinking water concerns. Included with the letter was the Region 6 "Review of Public Drinking Water Systems Near Crossett, Arkansas," which found the city's four public water systems to be in compliance with all State and Federal drinking water rules.

April 7, 2014 – EPA Region 6 emailed the draft action plan for Crossett to Pastor Bouie for his review and input. To date, no response from Pastor Bouie has been received.

April 8, 2014 – Conference call with Pastor Bouie, EPA Region 6, ADEQ and ADH to discuss resident concerns and the agenda for the April 12, 2014 community meeting.

April 9, 2014 – Conference call with EPA Region 6, ADEQ, and GP to discuss the community meeting on April 12, 2014.

April 12, 2014 – DRA Sam Coleman and staff from OEJTA participated in a second community meeting in Crossett, AR, along with representatives from the City of Crossett, ADEQ, and ADH. GP declined the invitation to participate in the meeting.

May 15, 2014 – Staff from the ADH LHU in Ashley County conducted a stroke awareness health fair for the Crossett community.

August 26, 2014 – ADEQ conducted a public meeting in Crossett in partnership with ADH and EPA to provide information and answer questions on operations at the GP plant. The meeting also included Concerned Citizens for Environmental Justice, the Crossett Water Commission, and staff from GP.